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June 8, 1984
Project No. 75803/191-66

Mr. Gerald Heyt
State of Michigan
350 Ottawa Avenue, N.W.
Grand Rapids, MI 49503

Dear Mr. Heyt:

Re: Wolverine World Wide, Inc. - Northeast Gravel Company - Kent County,
Michigan

At the request of Wolverine World Wide, Inc., we would like to summarize the discussion that occurred between the Michigan Department of Natural Resources and representatives of Wolverine World Wide, Inc. at a meeting held in your office on May 31, 1984. The attempt of this letter is to provide information which can be submitted to EPA during their review of the Northeast Gravel site. It is not our intent at this time to question the ranking of the Northeast Gravel site on the National Priority List. The purpose is to indicate to you our confusion after reviewing the State of Michigan's assessment of this site as well as the EPA Site Inspection Report. As you are aware, the purpose of our meeting was to ascertain whether the facts with which we have been presented are correct and whether they indeed should not be changed in the record to provide a more factual basis for understanding.

The Northeast Gravel site can actually be divided into three sub-sites. The most southerly sub-site is that site which accepted metal hydroxide residues and spent plating baths. The sub-site north of that was an old landfill and the sub-site north of the landfill received dewatered sludges generated by Wolverine World Wide. After reviewing the EPA Inspection Report, it would appear that all of the emphasis of that report pertains to the sub-site containing Wolverine World Wide waste. The report alleged that the waste is hazardous when, indeed, it is not. The report also indicated that groundwater contamination resulted from this sub-site when it is known that the problems which occurred in the past at the Northeast Gravel site occurred from the most

southerly portion of that site pertaining to the disposal of metal hydroxide residues. The following, therefore, are important facts which should be considered in clarifying the record:

1. As you are aware, Northeast Gravel Company accepted liquid and semiliquid plating residues into specific portions of the site which had been excavated. Wastes going into areas of the facility were primarily metal hydroxides and spent plating baths. Northeast Gravel did have a system for segregating certain wastes to different areas at the site but primarily the wastes received, as far as can be determined by us, were generally liquid in nature or dewatered by centrifuges to dewater them to a semiliquid state.
2. There were monitoring wells located throughout this portion of the facility. We are not sure at the present time how many ever did exist or where they were located but we are aware that sampling did occur since our laboratory was involved with some of the analyses. Most of the wells were located downstream from the main site.
3. Wolverine World Wide, a leather tanner located in Rockford, Michigan, requested permission of Northeast Gravel to dispose of dewatered tannery sludges on the Northeast Gravel property. A separate site was established north (upgradient) of the site which accepted the plating residues. The tannery sludge was a nonhazardous material and was dewatered to approximately 30 - 35% solids. The only metal it contained was trivalent chromium which had been precipitated in the waste treatment systems.
4. At about the time that RCRA regulations were being proposed, it was decided that monitoring wells should be installed south of that portion of the site where Wolverine World Wide waste disposed (north of the plating waste site) to check groundwater data specifically for metals. This data was used during the promulgation of the RCRA regulations to support the fact that the trivalent chromium in leather tanning wastes is bound and does not leach readily. These monitoring wells were checked periodically throughout the years since their installation and although a couple do not exist at the present time, monitoring wells still are present onsite for sampling.
5. The primary plating residue area was closed approximately one year before Wolverine ceased disposal at the site. As you are aware, Wolverine now disposes of their material at the 10-Mile landfill.
6. On Saturday, March 3, 1984, an article appeared in The Grand Rapids Press which indicated that the Northeast Gravel site was being considered for cleanup action under Superfund as well as Act 307. The Press article went on to indicate that the primary generator on that site was Wolverine World Wide.

7. Due to our confusion after this article regarding the primary generator, we requested information from Mr. Daniel Pierson of the Department of Natural Resources. Mr. Pierson sent us the MSAS Site Screening Table as well as the EPA Site Inspection Report prepared by the EPA contractor Ecology and Environment.
8. At approximately the same time that the above information was received, Wolverine World Wide addressed a letter to Mr. John Oakes of the USEPA in Chicago requesting information under the Freedom of Information Act for the site. Mr. Oakes sent the Potential Hazardous Waste Site Final Strategy Determination, EPA form T2070-5, as well as the Potential Groundwater Contamination Identification and Preliminary Assessment. He indicated that he was unable to release the EPA site inspection report due to legal ramifications.
9. The potential groundwater contamination source identification and preliminary assessment form appears to be accurate with regard to plating waste disposal. The identification and preliminary assessment form has the following important inclusions:
 - a. In the "Operation Characterization", it indicates that the site was used for the treatment of metallic sludges with lagoons.
 - b. Under "Waste Description", it is indicated that the waste is from metal hydroxides.
 - c. Under "Problem Characterization", it is indicated that unlined lagoons over permeable gravel and sands have leached with samples indicating higher-than-allowed nickel, chromium, zinc, cyanide and oil and grease.
 - d. Under "Compliance History", it is indicated that the sampling often exceeded compliance values.
 - e. Under "Contamination Information", it indicates that the wells are basically 900 feet to the south of the lagoon cells.
 - f. The assessment form indicates that Approved Industrial Removal Company was the number one customer of the landfill. The form indicated that the site was licensed to handle 675,000 gallons of liquids per month.
 - g. The assessment form seems to be accurate based on our knowledge of the site. It generally concludes that the problems that the DNR found related to the disposal of hydroxide sludges and liquids in the primary portion of the Northeast Gravel site. Nowhere do we find in the form that the groundwater contamination problems were attributed to the disposal of sludges by Wolverine World Wide. The compliance

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problems focused around the disposal by Approved Industrial Removal Company. The groundwater contamination which was noted, was obviously from metal hydroxide sludges based on the parameters which were found.

10. Now when one looks at the EPA site inspection report, the confusion mounts. The following items are important:

- a. In Part 2 under Waste Information it indicates that the material that was disposed of was sludge and the approximate yardage was 12,000 yards. It would appear that this reference is to the Wolverine material on the sub-site portion of the Northeast Gravel site. Part 2 also indicates that the material is toxic, persistent and soluble. However, we know that the tannery waste is not hazardous. That same form indicates that the 12,000 cubic yards pertains to plating wastes, but the Wolverine sludge is not a plating waste and does not contain the heavy metals which are listed.
- b. In Part 3 of the EPA Site Inspection Report, it indicates that the groundwater samples showed elevated levels of nickel, copper, chromium, zinc, cyanide, and oil and grease. This basically confirms the previous form discussed, that this sample was derived from the sampling wells south of the metal hydroxide area and has really nothing to do with the 12,000 cubic yards of tannery wastes.
- c. In Part 4 of that same form, it once again indicates the 12,000 cubic yards of material. It also goes on to indicate that the dewatered sludge was buried in 15' to 20' deep trenches which would again refer to the Wolverine site.
- d. In Part 9 of that form, the only generator listed is Wolverine World Wide.

* { This entire fact sheet was discussed with Mr. Fred Norling as well as Mr. John Oakes of the EPA. After going through it with them, they indicated also that there appears to be a great deal of confusion on the EPA Site Inspection Report. Although this is only a supposition, it appears that the EPA contractor, when interviewing various people on the site, related the Wolverine sub-site with the primary metal hydroxide site. The EPA report basically does not mention the metal hydroxide waste with the exception of the one part reporting groundwater contamination.

It is Wolverine World Wide's position to ensure that the record being sent to EPA in Washington for their review is accurate. Wolverine's position is that their waste is not hazardous and, therefore, should not be described as toxic and persistent. It is also Wolverine's position that the sub-site containing their wastes should not be included as a part of the total Northeast Gravel site for any regulatory purposes.

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We are hopeful that the State of Michigan can help Wolverine World Wide in ensuring that the record is clear. Once the record is straight, then we will review other portions of the appropriate regulatory acts to determine how to proceed. Right now we are not in a position to know whether the primary Northeast Gravel site is being evaluated or the portion of it where Wolverine World Wide's waste was disposed.

As indicated to you at our May 31 meeting, we believe the above facts to be accurate. Should you have any difficulty with what has been stated above, do not hesitate to call. In summary, it is our opinion that the State assessment of the Northeast Gravel site is accurate and even though EPA sent us this report, it is believed that the EPA site inspection report does not correlate well with the events stated in the State of Michigan file. Hopefully, this clarification can be communicated to EPA for their review.

Very truly yours,

FISHBECK, THOMPSON, CARR & HUBER, INC.



Carl V. Huber, P.E.

mea

cc: Robert Burch, Wolverine World Wide
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